

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Applicant:	Nikolai Grigoriev	Examiner:	Rachna Singh
Serial No.:	09/699,572	Group Art Unit:	2176
Filed:	October 30, 2000	Docket:	1571.001US2
Title:	METHODS FOR RENDERING TABLES		

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**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Mail Stop AF  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

The Applicant requests review of the final rejection in the above-identified application.  
No amendments are being filed with this request.

This request is being filed with a Notice of Appeal.

The review is requested for the reasons stated below.

***Rejections under 35 U.S.C. 103(a)***

The Examiner continues to reject the claims of this application under 35 U.S.C.103 (a) in view of Rao and Chatterjee. There have now been a total of 4 actions consisting of 2 Final's after a Request for Continued Examination (RCE).

The Examiner relies on Chatterjee for the teaching of a synchronization marker that is present in Applicant's independent claims and having the limitations recited in Applicant's independent claims, namely "wherein the cells are processed in a sequential order defined by their corresponding synchronization marker to render the grid."

Chatterjee specifically deals with versioning a database. One technique discussed in Chatterjee is to include within a database record a synchronization value, this value is used to match different versions of a plurality of different records within the database together to come up with a specific desired version. So, if a record A had a synchronization value of 1 and record B had a value of 1, then the two could be combined on the basis of the synchronization value to produce a version 1 for the database. Examples of this may be found throughout Chatterjee. *E.g.*, Chatterjee, col. 18, lines 36-51; col. 19, lines 25-29; lines 41-45; lines 56-61, *etc.*

These synchronization fields and values have nothing at all to do with processing order. The Examiner has cited the “state hierarchy” teaching of Chatterjee for the teaching that “cells are processed in a sequential order defined by their corresponding synchronization marker to render the grid.” Chatterjee, col. 13, lines 15-42 (as cited by the Examiner).

Chatterjee teaches and suggests that records of a database can be assembled in different combinations on the basis of their individual synchronization values. Each different combination is a specific version. The combinations can be made within a database table or across multiple tables as well. That is, a hierarchy based on state may span multiple tables to create a version for a state. The records that span multiple different tables all have the same synchronization value for the particular state in question. So, with a “state hierarchy, each state can have versions associated with several tables.” Chatterjee, col. 13, lines 51-53. The state hierarchy does not teach cells that “are processed in a sequential order defined by their corresponding synchronization marker to render the grid,” as is recited in Applicant’s independent claims.

More specifically, all records having the same synchronization value are processed together. There is no teaching of a sequential order and there is no teaching of cells being processed according to that sequential order.

Additionally, the Applicants are not teaching a versioning method. Versioning is the specific teachings presented in Chatterjee. The synchronization field as used in Chatterjee is not synchronization for purposes of rendering it is just a grouping field that permits similar or same versions of records within a database to be associated with one another. The fact that Chatterjee chose to use the phrases “synchronization fields” and “synchronization values” does not make its teachings the “synchronization marker” as defined and limited within Applicant’s independent claims.

In other words, Chatterjee is addressing a versioning issue with databases. It is not meant to address and was not intended to address rendering tables to media. It does not even do this function. Applicant respectfully asserts that one of ordinary skill in the art would therefore have not read Chatterjee and its teachings on “synchronization fields and values” to be the “synchronization marker” as defined in Applicant’s independent claims.

To further illustrate this point, the independent claims recite a limitation that the cells represent “different aspects of a same version of the generic table in an order defined by each

cell's synchronization marker . . .” *Emphasis added.* In Chatterjee, this teaching is not possible because records of the database are in fact grouped together on the basis of a same version. There are no further teachings or even suggestions of teachings where a single specific version can have “different aspects” of itself represented in “an order defined by” a “synchronization marker.”

In Chatterjee, the “synchronization field” is a reserved piece of metadata defined in a database schema for a type of record for a table. The “synchronization value” is a specific value assigned to instances of the “synchronization field.” That “synchronization value,” as taught and as even suggested in Chatterjee, does not provide a mechanism for representing “different aspects” of a same version (same “synchronization value” as defined in Chatterjee) in an order defined by the “synchronization marker.”

Essentially, the “synchronization value” in Chatterjee is nothing more than a synonym for its use of “version number.” Applicant submits that this would be the interpretation of one of ordinary skill in the art; especially in view of the core teachings of Chatterjee. This “synchronization field or value” does not provide a mechanism or a teaching by which a “same version” can have “different aspects” represented “in an order defined by each cell’s synchronization marker.” The uses of the phrases “synchronization field” and “synchronization value” do not teach or even suggest a processing order. In fact, for a single synchronization value that is by one order and that is the version number to which it is associated.

Applicant’s independent claims include limitations on the processing order of cells within a same version. This is not possible in Chatterjee since there is no need for an order within a same version and there is not even a concept of processing order that can be reflected in the “synchronization value.”

Thus, Applicant respectfully asserts that the Examiner is merely reading the term “synchronization” in isolation of its other qualifiers and meaning within Chatterjee for purposes of rendering the claims obvious. The teachings suggested by the Examiner do not exist, the state hierarchy has nothing to do with processing order and there is no teaching to suggest otherwise contrary to the assertion of the Examiner in the Final Office Action. Chatterjee is fundamentally about versioning and not about the rendering order or processing flow of a table from a grid to media. Applicant respectfully asserts that it stretches the imagination to view Chatterjee in the

manner suggested by the Examiner and such an interpretation and application is improper and unreasonable.

Accordingly, Applicant respectfully request that the claims be allowed and the rejections withdrawn.

### CONCLUSION

The Applicant respectfully submits that all of the pending claims are in condition for allowance, and such action is earnestly solicited. The Examiner is invited to telephone the below-signed attorney at (513) 942-0224 to discuss any questions which may remain with respect to the present application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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Date

04/05/06

By

  
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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 5 day of April, 2006

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